

McMAHON, S.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VELERON HOLDING, B.V.,

Plaintiff,

- against -

BNP PARIBAS S.A., et al.

Defendants.

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
DOC #
DATE FILED: 11/20/12

Case No. 12 CV 5966 (CM)

**STIPULATION AND  
~~PROPOSED~~ ORDER OF  
DISMISSAL WITHOUT  
PREJUDICE AS TO CERTAIN  
DEFENDANTS**

WHEREAS, on August 3, 2012 Plaintiff Veleron Holding, B.V. ("Veleron") commenced the above-captioned action (the "Action") against multiple defendants including, without limitation, ABN AMRO BANK HOLDING, N.V., ABN AMRO HOLDINGS, N.V., ABN AMRO CLEARING BANK, N.V., ABN CLEARING CHICAGO, LLC, ABN AMRO HOLDINGS USA, LLC, ABN AMRO SECURITIES (USA) LLC, ABN AMRO CAPITAL (USA) LLC, ABN AMRO FUNDING USA, LLC, ABN AMRO FUND SERVICES USA, LLC, FORTIS BANK (NEDERLAND) N.V. (collectively, "Dismissed Defendants"); and

WHEREAS, the Dismissed Defendants are not material to the adjudication of the claims and defenses asserted in the Action; and

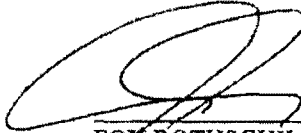
WHEREAS, the Parties have agreed to dismiss the Action against the Dismissed Defendants without prejudice and subject to the execution of a certain tolling agreement; and

WHEREAS, the Parties agree that the elimination of 10 defendants will enable the Parties to present their positions more efficiently and concisely;

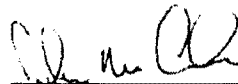
NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that all claims against the Dismissed Defendants are

hereby dismissed, without prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(2). This stipulation shall not waive or otherwise affect any objections to jurisdiction, venue, service, or any other affirmative defense that the Defendants may have or the Plaintiff's right to amend as a matter of course under Rule 15 of the Federal Rules of Civil Procedure.

Dated: New York, New York  
November 16, 2012

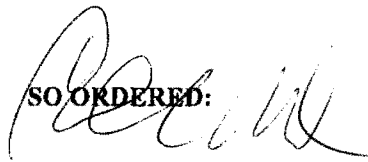


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11/20/2012



SO ORDERED:

Hon.  
USDJ